

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 06 C 7042
	)	
CONGRESS ENTERPRISES, INC.,	)	JUDGE SUZANNE B. CONLON
an Indiana corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, CONGRESS ENTERPRISES, INC., an Indiana corporation, in the total amount of \$42,900.75, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$545.00.

On December 27, 2006, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 16, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 1<sup>st</sup> day of February 2007:

Ms. Sharmaine Congress Rowe, Registered Agent  
Congress Enterprises, Inc.  
1001 South Lake Street  
Gary, IN 46403

/s/ Patrick N. Ryan

Patrick N. Ryan  
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